

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 1:18-CR-83
v.)	
)	Trial Date: July 25, 2018
PAUL J. MANAFORT, JR.,)	
)	The Honorable T. S. Ellis, III
)	
Defendant.)	

**GOVERNMENT'S RESPONSE TO THE
COURT'S PROPOSED JURY QUESTIONNAIRE**

On July 11, 2018, the Court issued an order to provide a jury questionnaire for all potential jurors in this case. In that same order, the Court invited the parties to propose changes to the Court's proposed jury questionnaire. Accordingly, pursuant to the Court's order and Rule 24 of the Federal Rules of Criminal Procedure, the government respectfully requests that the Court consider adding the following questions to its proposed jury questionnaire:

1. Do you have strong feelings about the tax system of the United States or the Internal Revenue Service?

_____ Yes _____ No

A. If yes, please explain:

2. Do you believe that violations of tax laws should not be prosecuted as crimes by the United States?

_____ Yes _____ No

A. If yes, please explain:

3. Do you believe that tax laws are unconstitutional?

_____ Yes _____ No

A. If yes, please explain:

4. In this case, the United States is represented by the United States Department of Justice through Special Counsel Robert S. Mueller, III. Is there anything regarding the Special Counsel's Office that would prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

_____ Yes _____ No

A. If yes, please explain:

5. In this case, the defendant is Paul J. Manafort, Jr. Is there anything regarding Mr. Manafort that would prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

_____ Yes

_____ No

A. If yes, please explain:

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

Uzo Asonye
Assistant United States Attorney
Eastern District of Virginia

By:

/s/

Andrew Weissmann
Greg D. Andres
Brandon L. Van Grack
Special Assistant United States Attorneys
Special Counsel's Office

U.S. Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530
Phone: (202) 616-0800

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July, 2018, I will cause to be filed electronically the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Thomas E. Zehnle (VA Bar No. 27755)
Law Office of Thomas E. Zehnle
601 New Jersey Avenue, N.W., Suite 620
Washington, D.C. 20001
tezehnle@gmail.com

Jay R. Nanavati (VA Bar No. 44391)
Kostelanetz & Fink LLP
601 New Jersey Avenue, N.W., Suite 620
Washington, D.C. 20001
jnanavati@kflaw.com

_____/s/_____
Uzo Asonye
Assistant United States Attorney
U.S. Attorney's Office
Eastern District of Virginia
2100 Jamieson Avenue
Alexandria, VA 22314
uzo.asonye@usdoj.gov
Phone: (703) 299-3700
Fax: (703) 299-3981

Attorney for the United States of America